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Attorney for Defendant
CLIFTON BURCH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC WORTHEN, TAJ ARMON REID,
a/k/a TAJ REID, DERF BUTLER,
ANTON KALAFATI, CLIFTON BURCH,
PETER MCKEAN, LEN TURNER, and
LANCE TURNER,

Defendants.

Case No. 3:17-cr-00175 CRB

**DEFENDANT CLIFTON BURCH'S
RESPONSE TO GOVERNMENT MOTION
REGARDING ENTRAPMENT**

Date: Sept. 18, 2018
Time: 2:00 p.m.
Judge: Hon. Charles Breyer
Dept.: Courtroom 6. 17th Floor

1 Defendant Clifton Burch responds to the Government's Motion for Disclosure of Intent to Raise
2 Entrapment Defense (ECF no. 251) as follows.

3 In its motion, the Government asks the Court to require notice and an offer or proof before an
4 entrapment defense can be raised to a jury at trial. The Government does not ask that an entrapment
5 defense be precluded at this time, but that the defense be required to give notice and make a prima facie
6 offer of proof before the defense may be raised.

7 Defendant Burch does not oppose the motion and will give reasonable notice and an offer of
8 proof before raising such a defense at trial.

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10 Dated: September 4, 2018

Respectfully submitted,

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12 By: /s/ Eduardo G. Roy

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14 EDUARDO G. ROY
15 Attorney for Defendant
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